

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

HAO ZHE WANG,

Plaintiff,

vs.

VERIZON COMMUNICATIONS INC., et al.

Defendants.

Case No.: 1:19-CV-09506-JMF

**DECLARATION OF DANIEL REED
REGARDING STATUS OF
DEFENDANTS NAMED IN
PLAINTIFF HAO ZHE WANG'S
SECOND AMENDED COMPLAINT**

Hon. Judge Jesse M. Furman

Compl. Filed: October 15, 2019

I, Daniel Reed, hereby declare as follows:

1. I am over the age of 18 and am competent to testify to the facts declared below, and could testify truthfully thereto if required. I am currently employed by Verizon Corporate Resources Group LLC as a Senior Analyst and Custodian of Record. I have held this position since 2005. In my capacity as a Senior Analyst and Custodian of Record, I provide services to and on behalf of Verizon New England Inc. ("VNE") and various other "Verizon" entities, particularly in relation to the handling of consumer disputes for Verizon, among other things.

2. In preparing this Declaration, I have relied on my personal knowledge of, and experience in, the business operations of VNE, as well as a review of VNE's business records. VNE's business records are made in the regular course of business, at or near the time of the acts, conditions or events described in the documents, and by or from information provided by a person with knowledge of the acts, conditions or events. I have reviewed the list of defendants named by Plaintiff in the Second Amended Complaint ("SAC"), and have reviewed the records for the VNE wireline service account associated with the South Hadley, Massachusetts property referenced in the SAC (the "Subject Account").

3. The Subject Account was exclusively established, owned, operated, and managed by VNE.

4. Cellco Partnership d/b/a Verizon Wireless is an entity that provides wireless voice and data services. Cellco Partnership d/b/a Verizon Wireless did not own, operate, or manage the Subject Account.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Jan 25, 2021

Executed on January ____, 2021 at Irvine, California.

Daniel Reed

Daniel Reed

Daniel Reed

E-signed 2021-01-25 11:48AM CST
daniel.reed@verizonwireless.com
Verizon Wireless Communications

Adobe Sign Transaction Number: CBJCHBCAABAAswwPENg86HgaalP9o998e9giinXfDRDy